



**JOHN CREUZOT**  
DISTRICT ATTORNEY  
CIVIL DIVISION  
DALLAS COUNTY, TEXAS

March 7, 2022

Graham White  
Elias Law Group, LLP  
10 G Street NE, Suite 600  
Washington, DC 20002

***Letter via email and documents via Serv-U file sharing***

Re: Defendant Michael Scarpello's supplemental documents  
responsive to Plaintiffs' First Set of Requests for Production  
*La Union Del Pueblo Entero, et al., v. Abbott, et al., 5:21-CV-844-XR*

Dear Mr. White:

Defendant Michael Scarpello's supplemental documents responsive to Plaintiffs' First Set of Requests for Production will be available through Serv-U file sharing. All counsel of record in this case will receive this letter and a link through a separate email. The password to access the documents will be **DCsupRFP2!** and will be available on Serv-U for the next 30 days. In looking back at what has been produced so far, please note that due to errors, there are breaks in the bates stamp numbers. Documents associated with numbers MS007416 and MS008206-MS008505 do not exist.

**The following documents are being produced pursuant to the Stipulated Confidentiality and Protective Order (ECF No. 237):**

- 1). A compressed text document with the name **MS009124 ULTRASENSITIVE LUPE RFP 3 Response from VR - Countywide\_VH\_2016\_2021\_220119** and size of 513,322 KB / 56,213 KB compressed. This document is ultrasensitive. We are unable to bates stamp each page and not able to label each page as ultrasensitive. This document is responsive to Request for Production 3,
- 2). Documents marked **MS009125-MS009144** are marked ultrasensitive and are responsive to Request for Production 7,
- 3). Documents marked **MS009145-MS012093** are marked ultrasensitive and are responsive to Request for Production 9,
- 4). Documents marked **MS012094-MS015462** are marked ultrasensitive and are responsive to Request for Production 11,
- 5). A compressed text document with the name **MS015463 ULTRASENSITIVE -List of Registered Voters** and size of 282,145 KB / 88,657 KB compressed. This document is

ultrasensitive. We are unable to bates stamp each page and not able to label each page as ultrasensitive. This document is responsive to Request for Production 11.

If you have any questions, please contact me.

Sincerely,

/s/Barbara S. Nicholas

Barbara S. Nicholas

Assistant District Attorney

Civil Division

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cc: counsel of record